

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

POWERTRAIN, INC.

PLAINTIFF

v.

Cause No: 1:11-cv-0015-GHD-DAS

**JOYCE MA and BEST MACHINERY
& ELECTRICAL, INC.**

DEFENDANTS

JOYCE MA

THIRD PARTY PLAINTIFF

v.

**WILLIAM SHAWN and
SHAWNCOULSON, LLP**

THIRD PARTY DEFENDANTS

MOTION FOR TIME TO REPLY ON MOTION TO DISMISS

William H. Shawn and ShawnCoulson, LLP file this Motion for Time To Reply on Motion to Dismiss. As grounds therefore, they would show the following:

1. William H. Shawn and ShawnCoulson, LLP have filed a motion to dismiss the amended third party complaint for failure to state a claim in this cause.
2. Counsel for third party plaintiff Joyce Ma has filed a response. A reply to that response is presently due on this date, March 3, 2014.
3. Undersigned counsel has not sought time previously on this reply.
4. Because of the press of other business, counsel requires an additional three days within which to reply, making a reply due on March 6, 2014.
5. No party would be prejudiced by the granting of this motion

Respectfully submitted this the 3rd day of March, 2014.

s/ T.H. Freeland, IV
T.H. Freeland, IV
Bar No. 5527

OF COUNSEL:

FREELAND & FREELAND, LAWYERS
1013 JACKSON AVE, P.O. Box 269
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CERTIFICATE OF SERVICE

I hereby certify that on this day I have caused a copy of the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following CM/ECF participant attorneys of record:

Duncan Lott
Langston & Lott
P. O. Box 382
Booneville, MS 38829-0382

Jeffery M. Navarro
P.O. Box 162
Amory, MS 38821

This the 3rd day of March, 2014.

s/ T.H. Freeland, IV
T.H. Freeland, IV